

**U. S. DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**CASE NO: 5:01-CV-0383**

**DATE: NOVEMBER 8, 2004**

**PRESIDING JUDGE: HON. FREDERICK J. SCULLIN, JR.**

**(X) PLAINTIFF**

**( ) DEFENDANT**

**( ) COURT**

**Plaintiff's Will Offer Exhibits:**

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-1				Quenneville	Niagara Mohawk Video "Boom-Tip Safety"
P-2				Quenneville	NYS Police Photo of poles, marked A and B by witness
P-3				Quenneville	NYS Police Photo of lines, marked C1, C2, D1, D2 and E
P-4				Quenneville	NYS Police Photo of rubber gloves on bucket of truck, "X" marking lip of bucket
P-5				Quenneville	NiMo Photo of boom of truck with pole and wire; marking denoting space (3') between primary lines
P-6				Quenneville	NYS Police Photo of leather gloves
P-7				Quenneville	Altec AN Series Operators, Maintenance and Parts Manual
P-8					Altec AM755-H brochure
P-9					Altec AM600/AM600-H brochure

**Exhibits Returned to Counsel (date):** \_\_\_\_\_

**Signature:** \_\_\_\_\_

P-10					Altec AM450-AM450-H brochure
P-11					Altec AM550/AM550-H brochure
P-12					Altec AM800/900 specifications
P-13					Altec AN Series specifications
P-14					Altec AL32 brochure
P-15					Altec AA755 brochure
P-16					Altec AA500/600 Series
P-17					Altec brochure showing full line of aerial devices
P-18					<u>Electrical World</u> article dated 07/15/75 concerning Pitman Safety Barrier Kit
P-19					<u>Electric Light &amp; Power</u> article dated August 1975 concerning Pitman Safety Barrier Kit
P-20				Quenneville	Plaintiff's Photo from inspection 8/00, shows bucket and jib and Dr. Durig
P-21				Quenneville	Plaintiff's Photo from inspection 8/00, side view of bucket and jib
P-22				Daino	NiMo Photo of accident scene, back of vehicle and pole (side view), marked with "X" and arrow
P-23					Quotation from J.C. Plastics, Inc. to Altec for Control Handle and Trigger
P-24				Daino	Altec's copy of close-up of top of pole
P-25				Daino	Altec's copy of photo of top of pole
P-26				Daino	OSHA Photo of accident scene, numbered "#13", of ground wire hanging from primary wire
P-27				Mathis	NiMo's Photo of the upper boom, knuckle and bucket, marking of "B", "C" and the jib circled

Exhibits Returned to Counsel (date): \_\_\_\_\_

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P-28				Mathis	Plaintiff's Photo from inspection 8/00, side view of vehicle with bucket in air, bucket area circled
P-29				Mathis	Plaintiff's Photo from inspection 8/00, back view of bucket and truck, controls circled
P-30				Mathis	Plaintiff's Photo from inspection 8/00, upper boom, bucket and jib, knuckle near jib is circled
P-31				Mathis	NiMo's Photo of bucket controls, circle and rectangle around controls, marked "A" and "B"
P-32				Mullady	Altec letter to customers dated June 15, 1994, attaching CSN-U-213
P-33				Schremp	Overhead photo of bucket taken at inspection
P-34				Ryan	Overhead photo of bucket taken at inspection
P-35				Schremp	Photo of boom-tip taken at inspection
P-36				Schremp	Niagara Mohawk Video "Safety Stand Down"
P-37				Ryan	Photo of boom-tip
P-38				Nicholson	Photo of entire truck with boom extended
P-39				Nicholson	Photo of boom-tip
P-40				Nicholson	Altec CSN-U-213 – Customer Service Newsletter dated July 12, 1993
P-41				Nicholson	Altec letter to customers dated August 21, 2000, attaching Electrical Continuity Hazard Safety Bulletin
P-42				Sytsma	Close-up photo of bucket control handles
P-43				Chard	Utility Patent Application – Isolation Mechanism for Electrically Isolating Controls of Boomed Apparatus (invented by Joshua T. Chard and Edman R. Blair)
P-44				Chard	NIOSH Safety Study chart

Exhibits Returned to Counsel (date): \_\_\_\_\_

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P-45				Chard	Prioritized Decision Criteria List
P-46				Chard	Altec letter to customers re boom tip cover kits
P-47				Chard	Altec document titled "Dielectric Testing for Isolated Controller"
P-48				Chard	Altec drawing no. 716-61925 – Single Handle Controller Assembly, Pilot Pressure System, Green
P-49				Chard	Altec drawing no. 716-61924 – Single Handle Controller Assembly, Full Pressure System, Green
P-50				Chard	Altec Inter-Office Correspondence dated April 10, 2001, from Joshua Chard to VPs, General Managers and Area Managers, re Altec SENTRY Program
P-51				Chard	Altec Marketing Information Letter Number 678: Altec SENTRY Program – Professional Operator Safety Training
P-52				Chard	Altec Marketing Information Letter Number 688: Altec SENTRY Program – Professional Operator Safety Training Services
P-53				Chard	Altec Marketing Information Letter Number 690: Altec SENTRY Program for Non-Insulated Aerial Devices
P-54				Chard	Altec AM650/AM855 Overcenter Material Handler brochure
P-55				Chard	Altec Quotation Number 12345 form for AM650 Aerial Device
P-56					Altec plastic model of insulated aerial lift device (for demonstrative purposes only)

**Exhibits Returned to Counsel (date):** \_\_\_\_\_

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P-57				Chard	Danger – Electrical Hazards placards (670-40453 B and 670-40454 B)
P-58				Chard	U.S. Patent and Trademark Office Filing Receipt acknowledging receipt of Patent Application for Isolation mechanism for electrically isolating controls of boomed apparatus
P-59				Chard	Altec Proposal for Project #1065 Start Up (January 28, 1997)
P-60				Chard	Altec memorandum from Mike Anderson to Jim Sytsma dated August 23, 1996 re Plan for Development of Contact Alert
P-61				Chard	Altec document dated 02/20/97 re Agenda for Project #1065 (2-21-97)
P-62				Chard	Contact Alarm Project Critical Issues
P-63				Chard	Three (3) pages of handwritten notes with “1065” at top of first page
P-64				Chard	Hand drawing titled “Project 1065 – Concept Display” dated 5-5-98
P-65				Chard	Letter from Bill Baker to Derald Morgan, Ph.D. dated 09/13/99 re Project #1065: “Continuous Leakage Monitoring System”
P-66				Chard	Altec Proposal dated 09/13/99 for Project 1065
P-67				Chard	Memo from J. Derald Morgan to Bill Baker dated 5/11/00 attaching his final report re his review of Electrical Hazard Warning System for Aerial Devices

Exhibits Returned to Counsel (date): \_\_\_\_\_

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P-68				Chard	J. Derald Morgan report titled "Electrical Hazard Warning System for Aerial Devices" (An evaluation of the proposed device as disclosed in Altec's patent application dated July 1, 1998, as a part of the Altec Project #1065, "Continuous Leakage Monitoring System").
P-69				Chard	Document titled "Electrical Hazard Warning System for Aerial Devices" with "Final Draft" handwritten in top right corner
P-70				Chard	United States Patent No. 6,170,607: Electrical Hazard Warning System for Aerial Devices
P-71				Chard	Altec Video, "Insulated Aerial Device Operator's Safety Video"
P-72				Chard	Altec Binder, "Insulated Aerial Devices Self-Directing Training Kit" with CD-ROM
P-73				Chard	<u>Utilities Products Showcase</u> article – "Altec Introduces New Products at 2002 EUFMC" (June 2002)
P-74				Chard	Printout of Altec web page titled "Altec Boom Tip Cover Program"
P-75 to P-175				Sherman	Wes Sherman photographs taken at inspection of accident unit and scene on 07/25/2003
P-176 to P-271				Frost	John Frost photographs taken at inspection of accident unit on 07/25/2003
P-272					Altec Invoice for accident unit
P-273					05/18/2000 memo from Ralph Dudley re "Energized Boom Ends"

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P-274					Accident re-enactment video – May 12, 2000
P-275					Altec Customer Service Notice CSN-A-207 – Boom and Platform Cover Improvement (09/14/2001) – Boom stow cover documents
P-276					New Product Process Objectives
P-277					Altec brochure listing AA, AT, AN, AO, AM and LB Series with general specifications sheet
P-278					Altec LRV Series brochure
P-279					Altec LR III-46 Series brochure
P-280					Altec LBM Series brochure
P-281					Altec L36A/L42A brochure
P-282					Altec AS 300 Series brochure
P-283					Altec A Class brochure
P-284					Altec AO442 brochure
P-285					Altec AO300 brochure
P-286					Altec AM650/AM855 brochure
P-287					Altec Revised Service Bulletin No. SB-AM-203
P-288					Altec Service Bulletin No. SB-AM-203
P-289					Interoffice Correspondence re new electrocution placard “All metal at boom tip”
P-290					Altec letter to operator on dielectric properties
P-291					1993 Customer Service Newsletter “All metal at boom tip... connected”
P-292					Chronology of Shaft Protector Kit and related documents on SB-AM-203

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P-293					8/25/94 letter to customers re Customer Service Newsletter CSN-U-213 on safety decals and operator manual supplements
P-294					Photograph of single stick control handle with rubber covering over handle (part no. 419734). Note: Component part to single stick control handle assembly no. 419668
P-295					Photographs of single stick control handle, boot cap and trigger disassembled
P-296					Photographs of single stick control handle, boot cap and trigger disassembled
P-297					Memo from Ed Vollmer to Jim Sytsma, Karen Bartlett and Dennis Rasmussen regarding Molded Handle Cost Comparison
P-298					Control handle drawings
P-299					Plastic Handle drawings
P-300				Chard	ISO-Grip Patent Application
P-301				Chard	Dielectric Test Form for Insulated Single Handle Control
P-302					Test Report TR-00117 and Summary – High voltage puncture test on Altec and Terex covers (Dan Bates – 03-27-02)
P-303				Chard	Prioritized Decision Criteria List on covers
P-304					Engineering Change Notice ECN-98-0682
P-305					Engineering Change Notice ECN-00-0707
P-306					Engineering Change Notice ECN-01-0923
P-307					Engineering Change Notice ECN-01-1174

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P-308					Altec EN-248-B (origin date 10/07/1986 – revision date 07/10/2001) – Reinforced Fiberglass Cover Specifications
P-309					Photographs referenced in Test Report TR-00117 (Exhibit 167 – Test Report by Dan Bates – High voltage puncture test on Altec and Terex covers)
P-310					Photographs referenced in Vollmer report
P-311					Altec rubber coated control handle with metallic core
P-312					Delrin control handle modeled from Altec rubber coated metallic core handle
P-313					ISO-Grip control assembly
P-314					Vollmer control handle
P-315					Boom tip cover for accident unit
P-316					Death Certificate of Timothy Everts
P-317					Funeral expenses for burial of Timothy Everts
P-318					Income tax returns for years 1995 to 2000
P-319					Union data on benefits
P-320					Table on decedent's earnings history
P-321					Table on decedent's past lost earnings
P-322					Table on decedent's future lost earnings
P-323					Letters of Administration issued to Heidi Everts

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**Plaintiff's May Offer Exhibits:**

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-324					List of federal court cases with Altec Industries listed as a defendant in a product liability action.
P-325					Expert Witness Report of B. Wesley Sherman, Ph.D.
P-326					CV of B. Wesley Sherman
P-327					Expert Witness Report of John Frost, P.E.
P-328					CV of John Frost, P.E.
P-329					Expert Witness Report of George J. Greene, P.E.
P-330					CV of George J. Greene, P.E.
P-331					Expert Witness Report of Kenneth W. Reagles, Ph.D.
P-332					CV of Kenneth W. Reagles, Ph.D.
P-333					Expert Witness Report of James Sytsma in <i>Walters v. Altec Industries, Inc.</i>
P-334					Photograph of handle developed by Altec for the AA Series
P-335					Altec Stability Test Form – AA Series (with jib)
P-336					Altec Stability Test Form – AA Series with lower boom lifting eye
P-337					Engineering Customer Survey
P-338					Altec Customer Service Newsletter CSN U-218
P-339					Altec Service Tips Bulletin No. ST-AA-221
P-340					Altec Customer Service Newsletter CSN-AA-222

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P-341					Altec Customer Service Newsletter CSN-AA-224
P-342					Altec Customer Service Newsletter CSN-AA-226
P-343					Altec Customer Service Newsletter CSN-AA-229
P-344					Altec Customer Service Newsletter CSN-AA-230
P-345					Altec Quality Bodies brochure
P-346					Altec – Exceeding Your Highest Expectations (Goals) brochure
P-347					Altec – Instructions for Upper Control Improvements
P-348					Altec Corporate brochure
P-349					Chance Sentinel Leakage-Current Monitor
P-350					Handwritten notes re current monitoring device
P-351					Evaluation of Proximity Warning Devices – Report prepared by Southwest Research Institute for Bureau of Mines
P-352					A Practical Review of High Voltage Safety Devices for Mobile Cranes
P-353					Documents related to proximity warning devices
P-354					Electroscan Model VIP500 and related documents
P-355					Uprox Proximity Warning Device, printed specs and related materials
P-356					15 Proximity Sensing Q&A's (TURCK)

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P-357					Assorted Patents A. Voltage Responsive Devices and Methods of Voltage Detection B. Proximity Alarm C. Proximity Differential Control D. Crane Boom Electrostatic Alarm E. Apparatus for Detecting Power Lines F. Proximity Alarm G. Voltage Proximity Detector H. General
P-358					Engineering Release No. 82-073
P-359					Altec's response to Plaintiff's Second Request for Production of Documents #19 – Engineering Change Notice
P-360					Engineering Release No. 86-043
P-361					Altec Interoffice Correspondence
P-362					Documents related to SB-AM-203
P-363					Documents related to SB-AM-203
P-364					Final Assembly Manual for Jib Installation
P-365					Photograph of Altec AA-500 unit 1. Cover over JCAB area 2. Jib
P-366					Photograph of Telelect Trial Mockup 1. Boom tip warning – “Beware – Electrocution Hazard” 2. Boom tip warnings – “Caution” 3. Boom tip warning – “Beware – Operator qualified”

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P-367					Photograph of Hi-Ranger A.    1.    Alternate bucket shaft cover 2.    Jib cylinder mechanism 3.    Second half of jib cylinder cover
P-368					Terex-Telelect Operator's Manual
P-369					ANSI A92.2 – 1979 Standard
P-370					Telelect Service Bulletin dated 01/15/1990 – Insulating Properties
P-371					MADDDC Initial Report of Suit
P-372					MADDDC Report of Closed Case
P-373					Terex-Telelect Safety Alert Bulletin SAB001-Electrical Continuity Hazard
P-374					Terex-Telelect Safety Alert Bulletin SAB003 – 2 pages
P-375					Terex-Telelect Product Advisory PA-1003-01 regarding boom tip covers – 2 pages (dated 05/30/2001)
P-376					Terex-Telelect 461104 cover drawings for OM Series – post-manufacture – remedial (dated 05/08/00)
P-377					DHHS (NIOSH) Publication No. 93-105 dated May 1993 – Preventing Injuries and Deaths from Metal-Reinforced Hydraulic Hoses
P-378					Photographs of “DANGER – Electrocution Hazard” warning label
P-379					Engineering Change Notice ECN-97-1147
P-380					Engineering Change Notice ECN-98-0918

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P-381					Engineering Change Notice ECN-99-1068
P-382					Altec letter to Customers dated 09/11/2002 – Introduction of new cover kits
P-383					Coroner photographs
P-384					Defendant's responses to Interrogatories in <i>Walters v. Altec Industries, Inc.</i>
P-385					Defendant's responses to Interrogatories in <i>Tymchuk v. Altec Industries, Inc.</i>
P-386				Quenneville	NYS Police Investigation Report
P-387				Quenneville	Plaintiff's Photo from inspection 8/00, knuckle between upper and lower booms circle and jib circled
P-388				Quenneville	Drawing by Matthew Quenneville of accident scene (overhead view)
P-389				Quenneville	Drawing by Matthew Quenneville of accident scene (side view)
P-390				Quenneville	Niagara Mohawk Power Corporation Linemen B Manual – Revised 1967
P-391				Quenneville	Lineman "C" School – Rough Outline of 1 week 1 day
P-392				Quenneville	Outline for Hotstick School
P-393				Quenneville	Timothy Everts' Line Mechanic "C" Hot Stick Training TL 403 – Student Course Record
P-394				Quenneville	Niagara Mohawk's Lesson Plan for Altec AN-652MH – Generation VI and Altec Manlift Bucket AN-650: Bucket Trucks Training Programs
P-395				Quenneville	Hotstick Manual (No. 586)

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P-396				Quenneville	Niagara Mohawk 15 kv Rubber Glove Training Program
P-397				Quenneville	Timothy Everts' Rubber Glove Committee T & D Training Department –15 kv Gloving Program Checklist
P-398				Quenneville	Drawing by Matthew Quenneville of the angles that the primaries came in to pole (overhead view)
P-399				Quenneville	Copy of Line Hose Training from NiMo's Responses
P-400				Quenneville	NYS Police Photo of knuckle near bucket and jib
P-401				Daino	Drawing by Paul Daino of accident scene (overhead view)
P-402				Daino	NiMo Photo of bucket liner with testing dates
P-403				Daino	NiMo Photo of electric insulation test record
P-404				Daino	Altec's Photo of "Electrocution Hazard" Warning placard near bucket
P-405				Daino	Altec's Photo of accident scene, back of vehicle, transformer on back of truck circled
P-406				Mullady	Niagara Mohawk Attendance Roster for 15 kv Rubber Glove Training Qualified Worker dated 8/31/99
P-407				Ryan	Diagram of top of pole by John Ryan
P-408				Ryan	Diagram of truck and pole by John Ryan
P-409				Nicholson	Photo of boom-tip marked by Stephen Nicholson
P-410				Nicholson	Photo of boom-tip with number 1 through 6 marked on it

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P-411				Nicholson	Photo of bucket and control handles with areas shaded in red ink
P-412				Chard	7 pages of Operator's Manual, section titled "Operation Near Energized Conductors"
P-413				Tice	Accident Prevention Rules (Orange Book)
P-414				Tice	Accident Prevention Rules – June 1997 (Green Book)
P-415				Chard	Printout of Altec computer screen showing employment status of Joshua T. Chard
P-416				Chard	Altec letter to customers enclosing Altec SENTRY Program brochure
P-417				Chard	Material Handling Capacity Charts dated October 10, 1997: Altec AM650
P-418				Chard	Specifications for a 50 foot hydraulic articulating overcenter aerial device
P-419				Chard	Altec AM650/AM855 Aerial Device Specifications
P-420				Chard	CAD drawing of installed ISO-Grip
P-421				Chard	7 pages from AM50/55 manual
P-422				Chard	Test Report TR-00081a: Evaluation of Insulated Linkages for Pilot Pressure Single Handle Control Assemblies (Bill Baker, 11-29-01)
P-423				Chard	Test Report TR-00081b: Evaluation of Insulated Linkages for Full Pressure Single Handle Control Assemblies (Kelly Williams)
P-424				Chard	Test Log for Project No. A36-80807, Test Report No. TR00081a, starting date 10/25/2001
P-425				Chard	Test Log for Project No. 80827, Test Report No. TR00081b, starting date 11/15/2002

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P-426				Chard	Test Log for Project No. 80827, Test Report No. TR00081b, starting date 1/4/2002
P-427				Chard	Altec Proposed Research Project RP013 (May 24, 2000) Boom Tip Monitoring System (BTMS)
P-428				Chard	Altec Proposed Research Project RP013 (March 3, 1999) Outline of Development Steps and Projected Timetable
P-429					OSHA investigation file
P-430					State of New York Workers' Compensation Board file on death claim (WCB Case #6000 6499)
P-431					Accident unit inspection video – August 29, 2000
P-432					Engineering drawings on control handle for AA Series, AM Series, AN, AS, Elevators and AT44
P-433					Engineering drawings on plumbing diagram for boom tip with jib
P-434					Engineering drawings on platform mounting assembly with hydraulic extend jib
P-435					Engineering drawings on Placard orientation, AA and AN Series
P-436					Altec dielectric test procedures
P-437					Hi-Ranger – Safety Rules and Precautions – Manual
P-438					Documents related to technical execution of SB-AM-203
P-439					Documents apparently related to SB-AM-203
P-440					Altec digger derrick and Altec aerial device history of product runs

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P-441					Boom Leakage Current Monitor Device/power Line Contact Detector
P-442					Documents re electrical contact alert
P-443					New Product Development – Boom Leakage Current Monitoring Device and Energized Conductor or Grounded Contact Alert
P-444					Documents related to SB-AM-203
P-445					Documents related to SB-AM-203
P-446					07/01/94 letter to customers re Revised Service Bulletin No. SB-AM-203 – Clarification of mandatory action Bulletin SB-AM-203
P-447					Inter-Office Correspondence to Customer Service Newsletter Recipients re CSN-U-214 and CSN-U-215
P-448					Photographs of Hi-Ranger A.     1.     Jib cylinder cover 2.     Band of Arrows warnings B.     1.     Jib cylinder cover 2.     Band of Arrows warnings
P-449					Photographs of Hi-Ranger A. B.

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P-450					Photographs of Hi-Ranger – Terex-Telelect A. Upper boom in cradle B. Lower and upper boom with jib assembly 1. Lower boom insert 2. Upper boom 3. Jib 4. Winch 5. Jib angle
P-451					Photographs of Terex-Telelect Hi-Ranger A. 3. Jib 4. Winch 5. Jib angle device 6. Jib angle device cover 7. Cover under bottom of boom tip B. 8. Sliding cover over top of jib 3. Jib 4. Winch 5. Jib angle device 6. Jib angle device cover 7. Cover under bottom of boom tip 8. Sliding cover over top of jib
P-452					Telelect's Non-Conductive Handle Memo – Schrader to Bassingthwaite (12/30/87)
P-453					Telelect-s Non-Conductive Handle Memo – Shrader to Bassingthwaite (09/22/88)
P-454					1979 Operator's Manual for Pitman Hotstick Articulated Aerial Lift Device

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P-455					Pitman Safety Barrier Kit A. Cover letter to "Director of Safety" B. Descriptive literature
P-456					Pitman Hotstik Safety Barrier System Background Study
P-457					ANSI A92.2 – 1990 Standard
P-458					ANSI Z535.4 – 1991 Standard
P-459					Photographs of Pitman Safety Barrier Kit in use on bucket truck
P-460					Photographs of Pitman Safety Barrier Kit in use on bucket truck
P-461					Photographs of Pitman Safety Barrier Kit in use on bucket truck
P-462					Terex-Telelect Campaign Bulletin 04-543-01 – Danger decal, Controls are not insulated or isolated
P-463					Altec drawing – Cover, Jib Winch (08/14/92)
P-464					Altec drawing – Cover, Jib Winch Extension (10/22/92)
P-465					Altec drawing – Cover, Controller (11/14/92)
P-466					Altec drawing – Cover, Platform Cam (09/16/93)
P-467					Altec drawing – Cover, Bucket Dump Rotator (09/10/93)
P-468					Altec drawing – Cover, Boom Tip, AM, with Hydr. Extend Jib (07/27/93)
P-469					Altec drawing – Cover, Jib Extension Cylinder (03/02/93)

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P-470					Quotation from J. C. Plastics, Inc. to Karen Bartlett with Altec dated 09/07/200 re Control Handle and Trigger
P-471					Test Report TR-00060 and Test Summary – Molded Plastic Control Handle Structural Test (Ed Vollmer – 04/04/01)
P-472					Test Report TR-00071 – Molded Plastic Control Handle Operational Endurance Test
P-473					Engineering drawing of ISO-Grip illustrating assembly and listing of component parts (01/29/2002)
P-474					Engineering drawing of assembled ISO-Grip with component parts description reference index guide (01/20/2002)
P-475					Test Log – Isolated Controller Cycle Testing (10/25/2001)
P-476					Test Log – Isolated control handle, test 2, full pressure controls (01/04/2002)
P-477					Price and feature quotation for AM 50 & 55 with ISO-Grip (p. 3 references Altec ISO-Grip insulated single handle control – rated 26.5kV
P-478					Altec drawing No. 703-91080 – Cover Assembly, Boom Tip, Material Handling (10/04/99)
P-479					Instructions – Cover Improvement Installation (Kit Part Nos. 750-40367 and 750-40396)
P-480					Instructions – Cover Improvement Installation (Kit Part Nos. 750-40373, 750-40398, 750-40403, 750-40404, 750-40405, and 750-40406)

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P-481					Instructions – Cover Improvement Installation (Kit Part Nos. 750-40382, 750-40397, 750-40399, 750-40400, 750-40401, and 750-40402)
P-482					Instructions (draft) – Cover Improvement Installation (Kit Part Nos. 750-40384 and 750-40394)
P-483					Instructions – Cover Improvement Installation (Kit Part No. 750-40385 and 750-40395)
P-484					Instructions – Cover Improvement Installation (Kit Part No. 750-40385)
P-485					Instructions – Cover Improvement Installation (Kit Part No. 750-40389)
P-486					(A-P) Photographs of Georgia Power unit taken by Joe Lane in Atlanta on 10/27/2002
P-487					Altec engineering drawing no. 706-60094 (Section B-B) – Cover, Jib Winch Extension
P-488					Altec engineering drawing no. 706-60094 (Section F-F) – Cover, Jib Winch Extension
P-489					Photographs of <u>Slaughter</u> inspection taken by Joe Lane on 12/11/2002.
P-490					Danger label – “DANGER – Electrocution Hazard” (label #670-40252 D)
P-491					Telelect plastic D-ring control handle
P-492					Telelect old-style plastic coated main control
P-493					Exemplar boom tip cover #1
P-494					Exemplar boom tip cover #2
P-495					Dr. Ken Reagles’ report on pecuniary losses

Exhibits Returned to Counsel (date): \_\_\_\_\_

Signature: \_\_\_\_\_

P-496 to P-506					Family photographs of Tim, Heidi and Tiffany Everts
P-507					Rubber gloves
P-508					Rubber line hoses
P-509					Complaint filed in this action
P-510					All discovery responses in this action

**Exhibits Returned to Counsel (date):** \_\_\_\_\_

**Signature:** \_\_\_\_\_